

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE)

et al)

Plaintiffs,)

v.)

Case 3:17-cv-601-MHL

JASON GOODMAN)

et al)

Defendants.)

DECLARATION OF ROBERT DAVID STEELE

Robert David Steele, under penalty of perjury, states as follows:

1. I am over 21 years of age and otherwise competent to make this Declaration. I have personal knowledge of the statements contained herein based upon (a) documents and information in my possession and control, (b) my personal observations, memory, and experiences, (c) public information and statements by Defendant, Jason Goodman, on YouTube and on Twitter, and (d) documents known or reasonably believed to be in the possession, custody and control of others. The statements in this Declaration are true and accurate to the best of my knowledge, information and belief.

2. I am one of the Plaintiffs in this action. I engaged Steven S. Biss to be Plaintiffs' counsel in this action.

3. I have reviewed Defendant Goodman's motion to disqualify Plaintiffs' counsel. I absolutely deny his "statement of facts" or that there is any basis to disqualify my counsel of choice. In response, I state as follows:

- a. There is no conspiracy to bring any legal action against Goodman;
- b. I have never agreed, combined or acted in concert with anyone to extort, harass, defame or disrupt Goodman's business and day-to-day activities;
- c. There is no plan to bring multiple lawsuits against Goodman;
- d. I have never spoken to my counsel or his wife about bringing multiple lawsuits against Goodman;
- e. I am not in contact and have no relationship of any kind with any of my counsel's other clients;
- f. My counsel's wife played no part in drafting the complaint or amended complaint in this case, and has played no role on this litigation;
- g. I did not pay any money to Chavez while encouraging him to bring a lawsuit against Goodman;
- h. I did not ever ask or encourage Chavez to produce false evidence about Goodman or supply any such evidence to my attorney;
- i. I did not ever received any false or fabricated evidence from Chavez or offer him a percentage of any recovery in this case if he provided such evidence;
- j. I have no knowledge and was not involved in any way in drafting Chavez' lawsuit against Goodman, and I was not aware that Chavez allowed the statute of limitations to expire;
- k. I have never seen EXHIBITS A, D, E, F or G to Goodman's motion, and do not know if these documents are authentic;
- l. I was not involved in drafting and have no first-hand knowledge of the document attached to Goodman's motion as EXHIBIT H.

4. I have reviewed Plaintiffs' memorandum in opposition to Mr. Goodman's motion to disqualify, and I swear or affirm that the factual statements contained in the memorandum are truthful and accurate to the best of my knowledge and belief.

In accordance with 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury that the foregoing is true and correct.

Executed in Oakton, Virginia, on December 9, 2019.

/s/

ROBERT DAVID STEELE